

Exhibit B

5. In my experience and pursuant to my authority as Athletic Director, one valid reason for a coach to exercise this authority to prevent a student-athlete from participating on a team would be if that student-athlete's presence on the team would be disruptive to overall team cohesion, morale, and/or performance.

6. While the fact that in some cases a coach's decisions regarding roster management may negatively impact an individual student-athlete's ability to participate in intercollegiate athletics at the College may be regrettable, a coach's obligation is to make decisions that are in the best interest of their team as a whole. As a general matter, the College does not interfere with a coach's roster decisions.

7. In late March 2022, I attended a meeting between Plaintiff John Doe, Coach Tom Donnelly, the track and field co-captains, and several College officials concerning Doe's request to rejoin the track and field team. During this meeting, the co-captains voiced concerns that they were uncomfortable with the possibility of Doe rejoining the track and field team.

8. During the Fall 2022 semester, Plaintiff made requests to rejoin the team. In response, the College communicated to Doe that, for his request to be considered, Doe would need to participate in a facilitated discussion with the head coach, Coach Donnelly, and the team co-captains to determine whether Doe's return to the team was achievable, considering team dynamics and performance.

9. It is my understanding that following facilitated discussions between Doe, Coach Donnelly, and the team co-captains, Coach Donnelly made the decision to uphold his previous decision to not allow Plaintiff back on the team.

10. At a December 19, 2022 meeting, I confirmed to Doe that Coach Donnelly's decision was final, and that coaches at the College have full autonomy over roster decisions, consistent with Athletic Department policy.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2nd day of February, 2023.


Danielle Lynch